



DEPARTMENT OF THE NAVY
BUREAU OF MEDICINE AND SURGERY
7700 ARLINGTON BOULEVARD
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IN REPLY REFER TO

6320
Ser M44/21UM43358
9 Dec 21

From: Chief, Bureau of Medicine and Surgery
To: Deputy Chief of Naval Operations (Manpower, Personnel, Training, and Education) (N1)

Subj: REQUEST FOR RELIGIOUS ACCOMMODATION THROUGH WAIVER OF
IMMUNIZATION REQUIREMENTS ICO CDR MOLLIE A. BILY, USN

Ref: (a) CDR Bily's Waiver Request of 7 Sep 21
(b) BUMED Memo, Diseases Targeted with Mandatory Vaccinations for U.S.
Navy Active Duty and Reserve Personnel of 22 Sep 21
(c) BUMED INST 6230.15B, Immunizations and Chemoprophylaxis for the Prevention
of Infectious Diseases, 7 Oct 13
(d) SECNAVINST 1730.8B CH-1

1. Subject matter experts at the Bureau of Medicine and Surgery have reviewed reference (a). Per reference (a), CDR Bily objects to receiving Coronavirus Disease 2019 (COVID-19) immunizations based on her religious beliefs.
2. All vaccines required for maintenance of individual medical readiness and vaccines required for specific overseas deployments meet the safety requirements of the U.S. Food and Drug Administration (FDA), and have demonstrated effectiveness in disease prevention.
3. Per reference (c), Active Duty and Reserve Component personnel will receive or be up-to-date on adult routine vaccinations. Details of required vaccinations are outlined in this instruction and are available at www.health.mil/vaccines.
4. A waiver of COVID-19 immunization requirements would have detrimental effects on the readiness of both CDR Bily and Service members who serve alongside CDR Bily. Primary prevention of disease through immunizations is a key enabler for maintaining force health protection and avoiding disease-related non-battle injury, and has been the cornerstone of these efforts for decades. Recent outbreaks of contagious viral diseases aboard Navy ships highlight the operational impact of low levels of immunity. Diseases such as COVID-19 are highly contagious and can rapidly degrade individual and unit readiness. In the current COVID-19 pandemic, the outbreak aboard the *USS THEODORE ROOSEVELT* in March 2020, resulted in 71 days of unavailability for a forward deployed aircraft carrier. There was an infection rate of more than 26% of the crew as confirmed by laboratory testing within 5 weeks of the initial positive case (including four hospitalizations and one death, according to data published in Journal of The American Medical Association 11 November 2020). This outbreak resulted in crew-wide quarantine, isolation, and repeated testing, and highlights the importance of vaccination to both individual and unit force health protection. Additional information on the potential impacts of COVID-19 and other vaccine-preventable diseases is provided in reference (b).

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5. The scientific and medical communities believe that SARS-CoV-2 will likely remain in global circulation as an endemic virus and a threat to the Force. The emergence of the SARS-CoV-2 Delta variant shows that while some vaccinated personnel may transmit the virus, they are largely protected against severe illness and death. Unvaccinated individuals remain at risk for developing COVID-19 and propagating new variants that may adversely impact the readiness of the Force.
6. Vaccination remains the most effective means to prevent COVID-19 (as well as influenza, pertussis, diphtheria, tetanus, and other diseases). Optimally, vaccination should be coupled with other countermeasures to minimize risk of infections to the Sailor's health, co-workers' health, and to Navy's mission. In large phase III trials, the FDA-approved COVID-19 vaccine demonstrated over 94% efficacy in preventing symptomatic COVID-19. For the same vaccine, against the Delta variant in a real world setting, studies show 88% effectiveness against symptomatic disease, to include hospitalization and death. Additional information on the efficacy of the COVID-19 vaccine is provided in reference (b).
7. Per reference (d), the religious objection of the Service member must be balanced against the medical risk to the Service member and their military unit. The Department of Defense has a compelling interest in mission accomplishment and safeguarding the health of military Service members. In this case, the medical risks of not receiving the COVID-19 vaccine outweigh the religious objection that CDR Bily has stated in reference (a).
8. A waiver of required COVID-19 immunizations is not recommended due to the aforementioned reasons.
9. My point of contact is *****, MC, USN, Preventive Medicine, who can be reached at *****

Deputy Chief
Business Operations